



west virginia department of environmental protection

Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
Phone: 304/926-0475 • Fax: 304/926-0479

Jim Justice, Governor
Austin Caperton, Cabinet Secretary
www.dep.wv.gov

Evaluation Memo

Application Number:	R13-2497B
Facility ID Number:	085-00004
Name of Applicant:	Dominion Transmission, Inc. (Dominion)
Name of Facility:	Craig Station
Latitude/Longitude:	39.07309/-81.09838
Application Type:	Class I Administrative Update
Submission Date:	January 25, 2017
Applicant Ad Date:	Not Applicable
Applicant Ad Newspaper:	Not Applicable
Complete Date:	January 25, 2017
Due Date:	March 26, 2017
Engineer:	Joe Kessler

On January 25, 2017, Dominion Transmission, Inc. (Dominion) submitted a Class I Administrative Update (A/U) to remove optional thermal oxidizer monitoring language for the unit located at the Craig Compressor Station located near Smithville, Ritchie County, WV. The Craig Compressor station was originally constructed in the 1980's (no minor source permit was required for internal combustion engines at the time) and consisted of three (3) Ajax DPC-720 720 horsepower (hp) compressor engines and a glycol dehydration unit (GDU). Since that time, the facility was the subject of several new source review (NSR) permitting actions.

- On May 16, 2001 Dominion received a “no permit needed” decision (PD01-043) to increase the power of the engines from 720 to 869 hp;
- On September 27, 2002, Dominion was issued Permit Number R13-2497 to authorize the construction and operation of a flare on the GDU to keep the facility from being a major source of Hazardous Air Pollutants (HAPs);

- On February 19, 2003, Dominion was issued Permit Number R13-2503 for the installation of two (2) 2,225 hp emergency generators; and
- On August 24, 2015, Dominion was issued Permit Number R13-2497A to remove the existing 25 mmscf/day TEG GDU and replace the unit with an Inegral 18 mmscf/day TEG GDU utilizing a thermal oxidizer (enclosed combustion device) to control regenerator still vent emissions.

Description of Proposed Changes

On January 25, 2017, Dominion submitted a Class I A/U to permit number R13-2497A to remove optional thermal oxidizer monitoring language under 4.2.3. of the permit. Currently this requirement gives the source three options for determining compliance with pilot flame monitoring on the thermal oxidizer. Dominion has stated that will meet this requirement by choosing the second option: by continuously monitoring using a thermocouple or an equivalent device. This change will help Dominion in showing an exemption for the GDU under the Compliance Assurance Monitoring plan for Title V permitting purposes.

Estimate of Emissions

Dominion is not requesting any increase in emissions as a result of the proposed changes discussed above.

Regulatory Applicability

45CSR13: Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, and Procedures for Evaluation

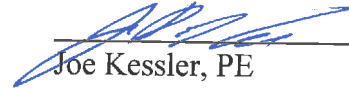
The proposed change to the Craig Compressor Station will not increase the PTE of any regulated pollutant. Therefore, pursuant to §45-13-4.2(a)(7), Dominion is requesting a Class I Administrative Update to make a "[c]hange in monitoring, recordkeeping or reporting requirements for sources which are not major sources which are determined by the Secretary to be equivalent or superior to the existing permit requirements."

Changes to Permit R13-2497A


Substantive changes to the permit are limited to the removal of 4.2.3(a), (b), and (d) from the permit and references to these requirements under 4.2.4(a) and (b).

Recommendation

The information provided in the permit application indicates that compliance with all applicable state and federal air quality regulations will continue to be achieved. Therefore, I recommend the issuance of the Class I Administrative Update R13-2497B to Dominion Transmission, Inc. for the changes outlined above.



Joe Kessler, PE
Engineer



Date